

# EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

Index No.:

-----X  
THELMA LIVERPOOL,

Date Purchased:  
**SUMMONS**

Plaintiff,

Plaintiff designates Kings County  
as the place of trial.

-against-

TARGET CORPORATION A/K/A TARGET STORES  
D/B/A TARGET T-1849,

The basis of venue is Plaintiff's  
residence:  
1300 Remsen Avenue  
Brooklyn, New York 11236.

Defendants,  
-----X

**To the above-named Defendant:**

**You are hereby summoned** to answer the complaint in this action, and to serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorneys within twenty days after the service of this summons, exclusive of the day of service, where service is made by delivery upon you personally within the state, or, within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Bronx, New York  
February 22, 2022

Yours etc.,

\_\_\_\_\_  
NONNA SHIKH, ESQ.  
THE LAW FIRM OF NONNA SHIKH, P.C.  
Attorneys for Plaintiff  
GWENDOLYN D. WIGGINS  
400 East Fordham Road, Suite 202  
Bronx, New York 10458  
(718) 295-4000

TO:

TARGET CORPORATION A/K/A TARGET STORES  
D/B/A TARGET T-1849 c/o CT CORPORATION  
28 Liberty Street  
New York, New York 10005

TARGET CORPORATION A/K/A TARGET STORES  
D/B/A TARGET T-1849  
1000 Nicollet Mall  
Minneapolis, Minnesota 55403

TARGET CORPORATION A/K/A TARGET STORES  
D/B/A TARGET T-1849  
139 Flatbush Avenue  
Brooklyn, New York 11217

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

-----X  
THELMA LIVERPOOL,

Plaintiff,

-against-

TARGET CORPORATION A/K/A TARGET STORES  
D/B/A TARGET T-1849,

Defendants,  
-----X

Index No.:

Date Purchased:

**VERIFIED COMPLAINT**

Plaintiff, by her attorneys, **THE LAW FIRM OF NONNA SHIKH, P.C.**, complaining  
of the Defendant, respectfully alleges, upon information and belief, as follows:

1. That at the time of the commencement of this action, Plaintiff **THELMA LIVERPOOL** resided in the County of Kings, City and State of New York.

2. That the cause of action alleged herein arose in the County of Kings, City and State of New York.

3. That at all times hereinafter mentioned, Defendant **TARGET CORPORATION A/K/A TARGET STORES D/B/A TARGET T-1849** (hereinafter referred to as "**TARGET**") was and still is a domestic corporation duly organized and existing under and by virtue of the laws of the State of New York.

4. That at all times hereinafter mentioned, Defendant **TARGET** was and still is a foreign corporation with headquarters at 1100 Nicollet Mall, Minneapolis, State of Minnesota and is doing business in the State of New York as "Target Retail Store".

5. That at all times hereinafter mentioned, Defendant **TARGET** was and still is a foreign corporation doing business in the State of New York.

6. That at all times hereinafter mentioned, Defendant **TARGET** was and still is a company duly organized and existing under and by virtue of the laws of the State of New York.

7. That at all times hereinafter mentioned, Defendant **TARGET** maintained a store located in the County of Kings, State of New York, at an address known as 139 Flatbush Avenue, Brooklyn, New York 11217 (hereinafter referred to as "Premises").

8. That on May 17, 2019, and at all times herein mentioned, Defendant **TARGET** owned the Premises.

9. That on May 17, 2019, and at all times herein mentioned, the aforesaid Premises were operated by Defendant **TARGET** and/or said Defendant's servants, agents, employees and/or licensees.

10. That on May 17, 2019, and at all times herein mentioned, the aforesaid Premises were managed by Defendant **TARGET** and/or said Defendant's servants, agents, employees and/or licensees.

11. That on May 17, 2019, and at all times herein mentioned, the aforesaid Premises were controlled by Defendant **TARGET** and/or said Defendant's servants, agents, employees and/or licensees.

12. That on May 17, 2019, and at all times herein mentioned, the aforesaid Premises were maintained by Defendant **TARGET** and/or said Defendant's servants, agents, employees and/or licensees.

13. That at all times hereinafter mentioned, the Defendant **TARGET** and/or said Defendants' servants, agents, employees and/or licensees repaired the aforesaid Premises.

14. That at all times hereinafter mentioned, the Defendant **TARGET** and/or said Defendant's servants, agents, employees and/or licensees inspected the aforesaid Premises.

15. On May 17, 2019, Plaintiff **GWENDOLYN WIGGINS** was lawfully on the aforesaid Premises.

16. That on May 17, 2019, while Plaintiff was lawfully inside of the aforesaid Premises, Plaintiff was caused to slip and/or trip and fall and sustain severe and permanent injuries.

17. The above-mentioned occurrence and the results thereof, were caused by the negligence of the Defendant and/or said Defendant's servants, agents, employees and/or licensees in the ownership, operation, management, maintenance, repair, inspection and control of the aforesaid Premises.

18. That, upon information and belief, Defendants had actual and/or constructive notice of this defective condition.

19. That no negligence on the part of the Plaintiff contributed to the occurrence alleged herein in any manner whatsoever.

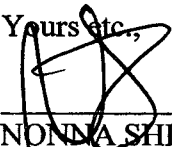
20. That by reason of the foregoing, Plaintiff **THELMA LIVERPOOL** was caused to sustain serious injuries and to have suffered pain, shock, mental anguish; that these injuries and their effects will be permanent; and as a result of said injuries Plaintiff has been caused to incur, and will continue to incur, expenses for medical care and attention; and, as a further result, Plaintiff was, and will continue to be, rendered unable to perform Plaintiff's normal activities and duties and has sustained a resultant loss there from.

21. That by reason of the foregoing, Plaintiff **THELMA LIVERPOOL** was damaged in a sum which exceeds the jurisdictional limits of all lower courts which would otherwise have jurisdiction.

**WHEREFORE**, Plaintiff demands judgment against the Defendant herein, in a sum exceeding the jurisdictional limits of all lower courts which would otherwise have jurisdiction, together with the costs and disbursements of this action.

Dated:           Bronx, New York  
                  February 22, 2022

Yours etc.,



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NONNA SHIKH, ESQ.  
THE LAW FIRM OF NONNA SHIKH, PC  
Attorneys for Plaintiff  
400 East Fordham Road, Suite 202  
Bronx, New York 10458  
(718) 295-4000

## ATTORNEY'S VERIFICATION

The undersigned, an attorney admitted to practice in the State of New York, affirms:

That the undersigned is associated with THE LAW FIRM OF NONNA SHIKH, P.C. the attorneys of record for the plaintiff in the within action; that the undersigned has read the foregoing and knows the contents thereof; that the same are true to the affirmant's own knowledge, except as to the matters therein stated to be alleged on information and belief; and as to those matters affirmant believes them to be true.


The undersigned further states that the reason this affirmation is made by the undersigned and not by our client is that the plaintiff is presently not within the county where your affirmant maintains her office.

The grounds of the affirmant's belief as to all matters not stated to be upon affirmant's knowledge are as follows:

Materials contained in the office file.

The undersigned affirms that the foregoing statements are true, under penalty of perjury.

DATED: Bronx, New York  
February 22, 2022

  
\_\_\_\_\_  
NONNA SHIKH. ESQ.



SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF KINGS

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THELMA LIVERPOOL

Plaintiff,

-against-


TARGET CORPORATE SERVICES, INC.,

Defendant.

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SUMMONS AND VERIFIED COMPLAINT

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NONNA SHIKH, ESQ.  
LAW FIRM OF NONNA SHIKH, PC  
Attorneys for Plaintiff  
400 East Fordham Road, Suite 202  
Bronx, New York 10458  
(718) 295-4000

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Form 27 - AFFIDAVIT OF SERVICE



P6123525

SHIKH/NONNA CATALINA FARRINGTON  
SUPREME COURT KINGS COUNTY STATE OF NEW YORK

THELMA LIVERPOOL

PLAINTIFF

- vs -

TARGET CORPORATION A/K/A TARGET STORES D/B/A TARGET T-1849, ETAL

DEFENDANT

index No. 505337/2022

Date Filed

Office No. 5570

Court Date.

STATE OF NEW YORK, COUNTY OF NEW YORK :SS:

ERIC GOLDKLANK being duly sworn, deposes and says; I am over 18 years of age, not a party to this action, and reside in the State of New York. That on the 24TH day of FEBRUARY, 2022 12:26PM at

C/O C T CORPORATION  
28 LIBERTY STREET  
NEW YORK NY 10005

I served a true copy of the ATTORNEY'S VERIFICATION, SUMMONS AND VERIFIED COMPLAINT upon TARGET CORPORATION A/K/A TARGET STORES D/B/A TARGET T-1849 the DEFENDANT therein named by delivering to, and leaving personally with PAULA CASTRO, CLERK AUTHORIZED TO ACCEPT a true copy of each thereof.

Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of the service as follows:

SEX: FEMALE COLOR: WHITE HAIR: BROWN

APP.AGE: 30 APP. HT: 5''5 APP. WT: 125

OTHER IDENTIFYING FEATURES

Sworn to before me this  
25TH day of FEBRUARY, 2022

SHAWN D FORBES  
Notary Public, State of New York  
No. 01FO6275296  
Qualified in KINGS COUNTY  
Commission Expires 01/28/2025

ERIC GOLDKLANK DCA LIC #1298914  
PM Legal, LLC  
1235 BROADWAY 2ND FLOOR  
NEW YORK, NY 10001  
Reference No: 3-NS-P-6123525

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SHIKH/NONNA CATALINA FARRINGTON  
SUPREME COURT KINGS COUNTY STATE OF NEW YORK  
THELMA LIVERPOOL

PLAINTIFF

index No. 505337/2022  
Date Filed  
File No. 5570  
Court Date:  
AFFIDAVIT OF SERVICE

- vs -  
TARGET CORPORATION A/K/A TARGET STORES D/B/A TARGET T-1849, ETAL  
DEFENDANT

STATE OF Minnesota, COUNTY OF Bassey :SS:

MR. Fallon Anderson, being duly sworn deposes and says:

Deponent is not a party herein, is over 18 years of age and resides in the State of Minnesota.

On 2/24/2022 at 2:26 pm

at CT Corporation Services, 1010 Dale Street N SAINT PAUL, MN 55117

deponent served the within ATTORNEY'S VERIFICATION, SUMMONS AND VERIFIED COMPLAINT on: TARGET CORPORATION A/K/A TARGET STORES D/B/A TARGET T-1849, the DEFENDANT therein named.

- ☐ #1 INDIVIDUAL By delivering a true copy of each to said recipient personally; deponent knew the person served to be the person described as said person therein.
- ☒ #2 CORPORATION By delivering a true copy of each to MR. Bob Gustafson personally,
- deponent knew the person so served to be the Registered Authorized Agent of the corporation, and authorized to accept service on behalf of the corporation.
- ☐ #3 SUITABLE AGE PERSON By delivering a true copy of each to \_\_\_\_\_ a person of suitable age and discretion.
- Said premises is DEFENDANT's: [ ] actual place of business [ ] dwelling house (usual place of abode) within the state.
- ☐ #4 AFFIXING TO DOOR By affixing a true copy of each to the door of said premises, which is DEFENDANT's: [ ] actual place of business [ ] dwelling house (usual place of abode) within the state.

Deponent was unable, with due diligence to find DEFENDANT or a person of suitable age and discretion, having called thereat

on the \_\_\_\_\_ day of \_\_\_\_\_ at \_\_\_\_\_  
on the \_\_\_\_\_ day of \_\_\_\_\_ at \_\_\_\_\_  
on the \_\_\_\_\_ day of \_\_\_\_\_ at \_\_\_\_\_  
on the \_\_\_\_\_ day of \_\_\_\_\_ at \_\_\_\_\_

Address confirmed by

- ☐ #5 MAIL COPY On \_\_\_\_\_ I deposited in the United States mail a true copy of the aforementioned documents properly enclosed and sealed in a post-paid wrapper addressed to the above address. Copy mailed 1<sup>st</sup> class mail marked personal and confidential not indicating on the outside thereof by return address or otherwise that said notice is from an attorney or concerns an action against the person to be served.

- ☒ #6 DESCRIPTION (USE WITH #1, 2 OR 3) Deponent describes the person served as aforesaid to the best of deponent's ability at the time and circumstances of the service as follows.

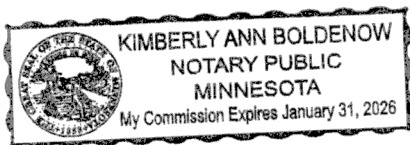
Sex: male Color: white Hair: Brown  
Age: 40's Height: 6'-2" Weight: 185 lbs

OTHER IDENTIFYING FEATURES: \_\_\_\_\_

- ☐ #7 WITNESS FEES The authorized witness fee and / or traveling expenses were paid (tendered) to the DEFENDANT in the amount of \$ \_\_\_\_\_
- ☐ #8 MILITARY SRVC Deponent asked person spoken to whether the DEFENDANT was presently in military service of the United States Government or of the State of \_\_\_\_\_ and was informed that DEFENDANT was not.

- ☐ #9 OTHER

Kimberly Ann Boldenow 2/28/22  
NOTARY NAME & DATE



Fallon Anderson  
PM Legal, LLC  
1235 BROADWAY 2ND FLOOR  
NEW YORK, NY 10001  
Reference No: 3-NS-P-6123541